

REMARKS

Applicant thanks the Examiner for considering the references cited in the Information Disclosure Statements filed on January 23, 2001, and January 29, 2003.

Regarding the drawings, Applicant submits that formal drawings will be filed upon allowance of the application.

Claims 1-20 are currently pending in this application. Independent claims 1, 6, 11, and 16 are amended, by this Amendment, to further clarify the invention. In view of the foregoing amendments and following comments, reconsideration and allowance of all the rejected claims are respectfully requested.

REJECTION UNDER 35 U.S.C. §102(e)

Claims 1-3, 6-8, 11-13 and 16-18 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Lau (USP 6,101,500). Applicant respectfully traverses this rejection on the following basis.

The invention is directed to a system for enabling client terminal users to manage conceptual information. Independent claims 1, 6, 11, and 16 recite enabling client terminal users to create at least one hierarchical data container and enabling client terminal users to create at least one hierarchical data list that includes the at least one hierarchical data container, wherein the data stored by the at least one hierarchical data list comprises a concept, among other things. In an exemplary embodiment, the invention relates to a system and method for storing conceptual information, wherein concepts are stored as single objects (see the specification at page 3, lines 18-19).

The objects include all information relating to the concept and are thus self-defining objects (see the specification at page 3, lines 19-20). A request for any information included in the concept may retrieve the entire object and may include the information stored as a hierarchy (see the specification at page 3, lines 20-22).

In contrast, Lau is directed to program for enabling network administrators to manage objects in a hierarchical data structure by determining a composite index for a network object in the hierarchical structure from one or more parameters, based on expert judgment (see Lau, col. 4, lines 30-36). Lau's composite index is determined by combining a first and a second parameterized property, which are associated with a first object, wherein the composite index represents a relative health of the first object and has a standardized value range (see Lau, col. 4, lines 42-45). For example, the state index may assume a value in the range of 0 and 1, inclusively (see Lau, Fig. 5A and col. 13, lines 55-59). To arrive at a value for the state index, the state processor 253 determines index information for a network entity according to the interpreted data and the object rules for the network entity, and transfers the index information to the interface processor 252 for display to the user 250 (see Lau, col. 11, lines 40-47). By determining a health index for the overall health, Lau reduces the amount of information that must be processed by the network administrator (see Lau, col. 3, lines 6-9).

Applicant respectfully submits that Lau is directed to a system for enabling a network administrator to manage existing network entities. However, Lau does not teach or suggest the features of the present invention directed to enabling client

terminal users to create hierarchical data structures. As a result, Applicant's claimed subject matter is distinguished over Lau.

Since Lau neither discloses nor suggests the invention claimed in independent claims 1, 6, 11, and 16 and their corresponding dependent claims 2, 3, 7, 8, 12, 13, 17, and 18, these claims clearly are not anticipated by Lau's disclosure. For the foregoing reason, reconsideration and allowance of these claims are requested.

REJECTIONS UNDER 35 U.S.C. §103

Claims 4, 5, 9, 10, 14, 15, 19 and 20 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Lau (USP 6,101,500), and further in view of Becker (USP 6,034,697). Applicant respectfully traverses this rejection on the following basis.

Claims 4, 5, 9, 10, 14, 15, 19 and 20 depend indirectly from respective ones of independent claims 1, 6, 11, and 16. As discussed above, independent claims 1, 6, 11, and 16 recite enabling client terminal users to create at least one hierarchical data container and enabling client terminal users to create at least one hierarchical data list that includes the at least one hierarchical data container, wherein the data stored by the at least one hierarchical data list comprises a concept, among other things.

The Examiner acknowledges the Lau is deficient because it does not teach a system wherein the color is defined according to three dimensions (see numbered paragraph 9 on page 5 of the May 6, 2003 Office Action). As discussed above, Applicant also respectfully submits that Lau is deficient because it is directed to program for enabling network administrators to manage objects in a hierarchical data structure by determining a composite index for a network object in the hierarchical

structure from one or more parameters, based on expert judgment (see Lau, col. 4, lines 30-36).

The Examiner relies on Becker for disclosing an interpolation method between relational tables for purposes of animating data visualization (see numbered paragraph 9 on page 5 of the May 6, 2003 Office Action). Even if Becker discloses this feature, Becker fails to teach enabling client terminal users to create hierarchical data structures. Thus, Applicant respectfully submits that Lau and Becker, both alone and in combination, are deficient because they fail to teach or suggest the claimed invention.

In view of the foregoing differences between claims 1, 6, 11, 16 and the cited art, Applicant respectfully submits that the Examiner has failed to establish a prima facie case of obviousness based on Lau in view of Becker. Thus, claims 1, 6, 11, 16 are believed to be allowable over these references, and claims 4, 5, 9, 10, 14, 15, 19 and 20 are believed to be allowable at least by virtue of their dependency.

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

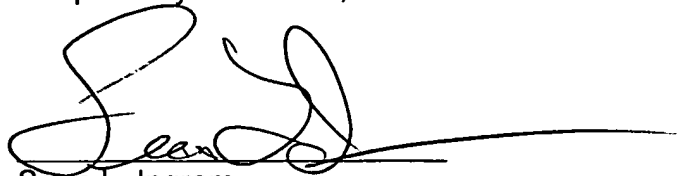
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If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: September 8, 2003

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sean L. Ingram', with a long horizontal line extending to the right.

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